

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

BIG LOTS, INC., et al.,¹

Debtors.

Chapter 111

Case No. 24-11967 (JKS)

(Jointly Administered)

REQUEST FOR SERVICE OF DOCUMENTS

PLEASE TAKE NOTICE pursuant to the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), including Bankruptcy Rules 2002, 3017, 9007 and 9010, and the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “Local Rules”), including Local Rules 2002-1, 3017-1, and 9006-1, that Hill, Farrer & Burrill, LLP, counsel for Oliveira Plaza SPE, LLC, and Rim Country Mall SPE, LLC (the “Landlords”) requests that all notices and pleadings given or required to be given in these cases be given to and served upon Hill, Farrer & Burrill, LLP, at the following address and facsimile number:

Daniel J. McCarthy
Hill, Farrer & Burrill LLP
One California Plaza, 37th Floor
300 South Grand Avenue
Los Angeles, CA 90071-3147
Telephone: (213) 621-0802
Facsimile: (213) 624-4840
Email: dmccarthy@hillfarrer.com

PLEASE TAKE FURTHER NOTICE that, pursuant to Bankruptcy Code section 1109(b), the foregoing request includes not only notices and papers referred to in the Rules specified above but also includes, without limitation, orders and notices of any application, motion,

¹ The debtors and debtors in possession in these chapter 11 cases, along with the last four digits of their respective employer identification numbers, are as follows: Great Basin, LLC (6158); Big Lots, Inc. (9097); Big Lots Management, LLC (7948); Consolidated Property Holdings, LLC (0984); Broyhill LLC (7868); Big Lots Stores - PNS, LLC (5262); Big Lots Stores, LLC (6811); BLBO Tenant, LLC (0552); Big Lots Stores - CSR, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Big Lots eCommerce LLC (9612); and Big Lots F&S, LLC (3277).

petition, pleadings, request, complaint or demand, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, hand delivery, telephone, telegraph, facsimile, telex or otherwise, that affect the above-captioned debtors or property of the debtors' estates.

PLEASE TAKE FURTHER NOTICE that this Request for Service of Documents shall not be deemed or construed to be a waiver of any substantive or procedural right of the Landlords, including without limitation, to: (a) require that where any adversary proceeding is to be initiated against the Landlords in this or any related case or where any proceeding is to be initiated by complaint against the Landlords in accordance with applicable non-bankruptcy law, service shall be made on the Landlords in accordance with the Federal Rules of Bankruptcy Procedure, the Federal Rules of Civil Procedure, and applicable non-bankruptcy law and that service upon undersigned counsel is insufficient for such purposes; (b) have final orders in noncore matters entered only after *de novo* review by the United States District Court; (c) trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case; (d) have the United States District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; (e) compel arbitration of any disputes arising under or relating in any way to any contract, lease or other agreement or arrangement between the Landlords, the debtors or any third party; or (f) any other rights, claims, actions, defenses, to which the Landlords are or may be entitled at law or in equity, all of which rights, claims, actions and defenses the Landlords expressly reserve.

Dated: October 1, 2024

HILL, FARRER & BURRILL, LLP

/s/ Daniel J. McCarthy

Daniel J. McCarthy (CA Bar No. 101081)

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*Attorneys for Oliveira Plaza SPE, LLC, and
Rim Country Mall SPE, LLC*

CERTIFICATE OF SERVICE

I hereby certify that I am over the age of 18 and not a party to the within action; my business address is 300 S. Grand Ave., 37th Floor, Los Angeles, California 90071. I also certify that on October 1, 2024, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF system, which will automatically send e-mail notifications to all parties and counsel of record.

/s/ Sonia Padilla
SONIA PADILLA